

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF)	
v.)	Case No. 08 CR 325
)	
)	Judge Joan Lefkow
TERRANCE SEWELL,)	
)	
DEFENDANT)	

**DEFENDANT SEWELL'S EMERGENCY MOTION FOR A MODIFICATION OF
TERMS OF RELEASE ON BOND**

Now comes Defendant Terrance Sewell, by and through his attorney and moves this Court to modify the terms of his release to allow him to remain on bond without electronic monitoring and confinement to his home. . In support of this motion, Defendant states the following.

1. The Court placed Mr. Sewell on bond with one principal condition that he be on home incarceration. He has complied with the terms of his release.

2. Mr. Sewell was then allowed to leave his home and look for work. He has done that in conjunction with his pretrial services officer, Pace Morrison.

3. Defendant has obtained a part-time job at the YMCA on Cermak and will begin work later today. Given his progress, he requests that he be removed from electronic monitoring and home confinement and allowed to continue to remain on bond with all other conditions remaining in place.

4. The government is likely to oppose this motion. Defendant's

attorney has not yet spoken to Mr. Sewell's pretrial services officer, Pace Morrison to determine his position as to this motion.

WHEREFORE DEFENDANT Sewell prays that this Court grant his motion to modify the conditions of his pretrial release to allow him to be removed from electronic monitoring and home confinement.

Respectfully submitted,

s/Steven Saltzman
Attorney for Defendant Sewell

Steven Saltzman
122 S. Michigan Ave. Suite 1850
Chicago, IL 60603
312-427-4500